UNITED STATES DISTRICT COURT EASTERN DISTRICT OF MICHIGAN SOUTHERN DIVISION

JACK REESE, JAMES CICHANOFSKY, ROGER MILLER, and GEORGE NOWLIN on behalf of themselves and a similarly situated class, Plaintiffs,

Hon. Patrick J. Duggan

Case No. 04-70592

v. Class Action

CNH INDUSTRIAL N.V. and CNH INDUSTRIAL AMERICA LLC,

Defendants.

EXHIBIT Q

<u>To</u>

<u>PLAINTIFFS' RESPONSE</u> TO CNH'S MOTION FOR SUMMARY JUDGMENT

Employee Contributions to Employer-Provided Medical Plans by Bargaining Status, Private Industry, 2005

U.S. Bureau of Labor Statistics

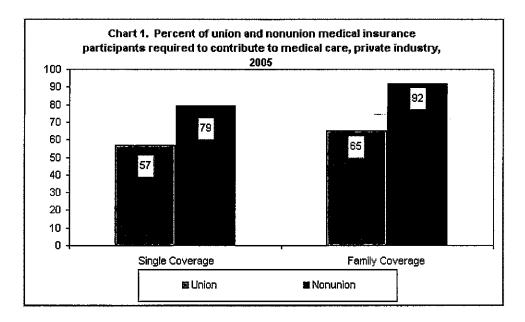
Posted: August 31, 2005

Employee Contributions to Employer-Provided Medical Plans by Bargaining Status, Private Industry, 2005

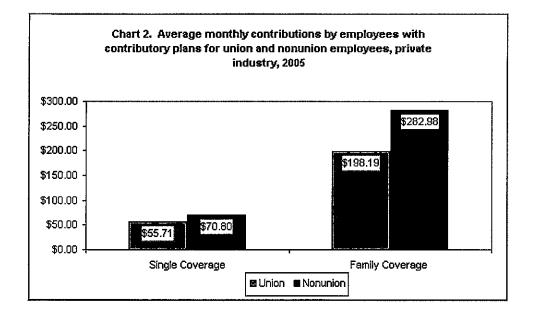
by Elizabeth M. Greenlees and Paul A. Welcher

Originally Posted: August 31, 2005

The percentage of employees required to contribute to employer-provided medical insurance plans, single or family coverage, varies among all major occupational categories and other worker characteristics; however, the gap in contribution requirements between union and nonunion employees is especially notable.



Among employees who participate in medical care plans,¹ 57 percent of union workers with single coverage plans are required to contribute some portion of their medical care premiums, while 79 percent of nonunion workers with single coverage plans are required to contribute toward their premiums. For family coverage plans, an even stronger difference exists between union and nonunion employees: 92 percent of participating nonunion workers with family plans are required to contribute toward their medical insurance premiums, while only 65 percent of participating union workers are required to do so.



Among workers with single coverage plans who are required to make flat contributions toward their medical insurance
premiums, the average monthly contribution is \$55.71 for union members and \$70.80 for nonunion workers. As with
the proportion of workers required to contribute toward their premiums, the difference between union and nonunion
workers is even more pronounced for family coverage, where the average monthly contribution is \$198.19 for union
workers and \$282.98 for nonunion workers.²

NOTE: Standard errors have not been calculated for National Compensation Survey Benefits estimates. Consequently, none of the statistical inferences made in this report could be verified by a statistical test. Calculation of the average employee contribution does not include plans in which the employer pays the full premium.

SOURCE: These data are from "National Compensation Survey: Employee Benefits in Private Industry in the United States, March 2005," Summary 05-01 (Bureau of Labor Statistics, August 2005); available on the Internet at http://www.bls.gov/ncs/ebs/sp/ebsm0003.pdf.

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Notes

1 In private industry, 92 percent of union members and 68 percent of nonunion employees have access to medical care benefits; 83 percent of union workers and 49 percent of nonunion workers choose to participate in these benefits.

2 Furthermore, of all those participating in contributory medical plans, union members pay 10 percent of their single coverage medical insurance premiums, while their employers pay the remaining 90 percent. Their nonmember counterparts pay 19 percent of their single coverage premiums, while their employers contribute 81 percent. For family coverage, both union members and nonunion workers pay a greater proportion of their medical insurance premiums—16 percent and 32 percent, respectively.

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★U.S. BUREAU OF LABOR STATISTICS

COMPENSATION AND WORKING CONDITIONS

Data for Chart 1: Percent of Union and Nonunion Medical Insurance Participants Required to Contribute to Medical Care, Private Industry, 2005

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Union	57	65
Nonunion	79	92

Data for Chart 2: Average Monthly Contributions by Employees with Contributory Plans for Union and Nonunion Employees, Private Industry, 2005

	Union	Nonunion
Single Coverage	\$55.71	\$70.80
Family Coverage	\$198.19	\$282.98

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